

Larry H. Krantz
Marjorie E. Berman
Hugh D. Sandler

Jerrold L. Steigman
Counsel

Nicolas J. Rovner

Lisa A. Cahill
Wendy Gerstmann Powell
Of Counsel

Writer's E-mail

lkrantz@krantzberman.com

January 28, 2021

VIA ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: Grablis et al., v. One Coin Ltd. et al., 19-cv-4074-VEC (S.D.N.Y.)

Dear Judge Caproni:

We have just been retained to represent Defendant Gilbert Armenta in the above-referenced matter. We write this letter to respectfully request a brief (25 day) adjournment of the current February 1, 2021 deadline by which Mr. Armenta must respond to Plaintiffs' amended complaint. In accordance with Rule 2.C of Your Honor's "Individual Practices In Civil Cases," we provide the following information in support of our request:

- (1) We seek this adjournment to allow us time to familiarize ourselves with the pleadings and relevant facts, and to generally 'get up to speed,' so that we may properly answer or otherwise respond to the complaint. Because we were just retained, Mr. Armenta would be severely prejudiced by our having to meet the current filing deadline of this Monday, as we have virtually no prior familiarity with the matter;
- (2) The original due date was November 23, 2020;
- (3) One previous request for adjournment was made on November 23, 2020 (ECF No. 149), which Your Honor granted to the extent of making the new deadline February 1, 2021 (ECF No. 150).
- (4) We have corresponded with Plaintiffs' counsel and they have confirmed that they do not object to this request; and
- (5) We respectfully request a three and a half week extension to February 26, 2021.

We greatly appreciate the Court's courtesy in considering this request.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Larry Krantz". The signature is stylized with a large "L" and a long horizontal stroke.

Larry Krantz